

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RECOVERY EFFORT INC.,	:
	:
Plaintiff,	:
	:
- against -	:
	:
ZEICHNER ELLMAN & KRAUSE LLP,	:
WACHTEL MISSRY LLP, YOAV M.	:
GRIVER, and WILLIAM B. WACHTEL,	:
	:
Defendants.	:
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19 Civ. 5641 (VSB) (KHP)

**REPLY DECLARATION
OF MICHAEL T. SULLIVAN**

MICHAEL T. SULLIVAN, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a partner with the firm of Sullivan & Worcester LLP, counsel to defendants Zeichner Ellman & Krause LLP and Yoav M. Griver (together, the “ZEK Defendants”). I submit this reply declaration in further support of the ZEK Defendants’ Motion to Dismiss the First Amended Complaint.

2. A true and correct copy of the so-ordered Stipulation of Withdrawal of Counsel, dated January 9, 2017 and filed in the matter of *Genger v. Genger*, Index No. 109749/2009 (Sup. Ct. NY County) (the “2009 Action”) (NYSCEF No. 1501), is attached hereto as Exhibit V.

3. A true and correct copy of the so-ordered Stipulation of Withdrawal of Counsel, dated January 9, 2017 and filed in the matter of *Genger v. Genger*, Index No. 651089/2010 (Sup. Ct. NY County) (the “2010 Action”) (NYSCEF No. 1486), is attached hereto as Exhibit W.

I declare under the penalty of perjury that the foregoing is true and correct.

Date: New York, New York
May 28, 2020

/s/Michael T. Sullivan
Michael T. Sullivan